

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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)	
UNITED STATES OF AMERICA)	
)	
v.)	No. 1:20-cr-10307-DPW
)	
GUSTAVO KINRYS,)	
)	
Defendant)	
)	
)	

JOINT REPORT FOR OCTOBER 21, 2021 FINAL STATUS CONFERENCE

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(c).

1. The parties submit that the case is ready to be referred to the district judge for an initial pretrial conference.

A. The government produced automatic discovery to the defendant. To date, the government has produced over 361,000 pages in searchable discovery, along with a searchable, sortable index. The government produced an additional 100 pages to the defendant this week.

B. There are no discovery requests outstanding, or that need to be resolved by the Court.

C. Based on the review of the discovery, the defendant does not anticipate filing any motions pursuant to Fed. R. Crim. P. 12(b).

D. The Court has excluded the time from January 4, 2021 through October 21, 2021 under the interest of justice provision of the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A). The parties jointly ask the Court to exclude the time from October 21, 2012 until the date of the first

pretrial conference. The ends of justice served by this exclusion outweigh the interests of the public and the defendant in a speedy trial. Six days, from December 10, 2020 to December 17, 2020, are chargeable against the statutory speedy trial clock.

E. The parties estimate that a trial in this case would last require approximately three weeks.

Respectfully submitted,

NATHANIEL R. MENDELL,
Acting United States Attorney

Patrick Callahan

Patrick M. Callahan
Assistant United States Attorney

GUSTAVO KINRYS
Defendant

J. W. Carney, Jr.

J. W. Carney, Jr.
Daniel J. Gaudet
Counsel for the Defendant

Dated: October 20, 2021

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

Daniel J. Gaudet

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